

RE: Psychology - Master Temporary Limited License Psychologist (TLLP)

Dear Professional,

Our office has recently become aware that many of our licensees with Masters Temporary Limited License Psychologist (TLLP) have been extended and renewed beyond the 18 months which is contrary to what is allowed under state statute.

Pursuant to the Public Health Code, MCL 333.16181, this statutory provision provides for the issuance of a TLLP for masters degreed Psychologists but does not allow for these temporary licenses to be renewed or extended beyond the 18 months:

Public Health Code Act 368 of 1978, MCL 333.16181 (1):

A board may grant a nonrenewable, temporary license to an applicant who has completed all requirements for licensure except for examination or other required evaluation procedure. A board shall not grant a temporary license to an individual who has previously failed the examination or other required evaluation procedure or whose license has been suspended or revoked. A temporary license under this subsection is valid for 18 months, but a board shall automatically void the temporary license if the applicant fails the examination or other required evaluation procedure.

As you may be aware this temporary license provision was put in the law to allow TLLP(s) to gain enough hours of professional experience and training as well as prepare and take the exam to qualify for a full Limited License Psychologist (LLP) with a masters' level degree.

The Bureau of Professional Licensing (BPL) within the Michigan Department of Licensing and Regulatory Affairs (LARA) having reviewed the statutory provisions in the Public Health Code, MCL 333.16181 is taking the following actions to ensure that the law is implemented properly:

Effective immediately, the agency will no longer accept any NEW requests from current TLLPs wanting to extend their temporary license and/or renew if they have already met the 18 months of having this temporary license.

Current TLLPs that are within the 18 months will be able to continue as a TLLP but will need to work towards passing the exam and meet the requirements for a Limited License Psychologist and apply at that time, knowing that they will not be able to renew their temporary license as a TLLP should the licensee want to continue practicing as a Masters Limited Licensed Psychologist (LLP). For these licenses, the agency will also allow for the expiration date of August 31, 2017 or the date currently scheduled on the license, whichever is later.

Individuals who have been previously approved an extension of their TLLP whereby the temporary license expires the agency will do the following:

- If the TLLP was previously approved for an extension or renewed (renewed beyond the initial 18 months for another 18 months, etc.) whereby the TLLP expires - for example in February, March, April, May, June, or July 2017 - the agency will allow the temporary license to expire on August 31, 2017.
- If the TLLP was previously approved for an extension or renewed (renewed beyond the
 initial 18 months for another 18 months, etc.) whereby the temporary license expires for example in September, October, November, December 2017 or into 2018, the
 temporary license will expire on the scheduled date and not on August 31, 2017. The
 agency will honor the expiration date printed on the license.

Again, once the expiration date has occurred, these TLLPs will not be renewed or extended pursuant to the PHC, MCL 333.16181. Given that there are a number of TLLPs who are affected with having this temporary license and having been previously allowed to extend or renew beyond the 18 months and because of the confusion around the actual provision of the law (PHC, MCL 333.16181), the agency hopes that this will give affected individuals time to take and/or retake the exam and pass to meet the qualifications to apply for full licensure.

Further, in order to obtain a Limited License which is the next level of licensure, a licensee must have passed the required exam in addition to obtaining the required number of supervised hours as a TLLP. Administrative Rules 338.2561(d) and 338.2563 address the requirement to pass the exam to be eligible for a Limited License Psychologist (LLP). The rules can be found here. Therefore, upon the expiration of the Temporary Limited License Psychologist (TLLP), a licensee may not renew the temporary license and may only apply for a Limited License Psychologist (LLP) if he/she meets all requirements, including, but not limited to, passing the exam and having obtained the required supervised hours.

Again, this change is to ensure that the agency is consistent with implementing the law as currently written and setting a pathway to achieve this while being sensitive to those affected by giving notice and some time for individuals to transition accordingly.

Should you have questions regarding this process, please contact Kathy Sly, Licensing Manager at 517-241-6447 or me at 517-335-1696. You may also send an email at BPL-Help@michigan.gov.

Sincerely,

Kim Gaedeke, Director Bureau of Professional Licensing